# PART 70 OPERATING PERMIT
# OFFICE OF AIR MANAGEMENT

**United States Can Company**
**U.S. Routes 12 & 49**
**Chesterton, Indiana 46304**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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| Operation Permit No.: T127-7553-00012 | |
| Issued by:<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Management | Issuance Date: |

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal can surface coating operation.

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| Responsible Official: | Jerry Nelson |
| Source Address: | U.S. Routes12 & 49, Chesterton, IN 46304 |
| Mailing Address: | U.S. Routes12 & 49, Chesterton, IN 46304 |
| SIC Code: | 3411 |
| County Location: | Porter |
| County Status: | Nonattainment for ozone |
| Source Status: | Part 70 Permit Program<br>Major Source, under Emission Offset Rules;<br>Major Source, Section 112 of the Clean Air Act |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) Emission unit P001 consists of the following:

(a) One (1) rollcoater, one (1) lithography press and a direct fired natural gas line oven, identified as PC-1, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-1 and S-2.

(b) One (1) rollcoater, three (3) lithography presses and a direct fired natural gas line oven, identified as PC-2, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr , respectively, and exhausting to stacks S-3 and S-4.

(c) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-7, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-6 and S-7.

(d) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-8, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-8 and S-9.

(e) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-9, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-10 and S-11.

(f) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-10, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-12 and S-13.

(2) Emission unit P002 consists of the following:

(a) One (1) rollcoater and direct fired natural gas line oven (8.9 MMBtu/hr), identified as C-3, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(b) One (1) rollcoater and direct fired natural gas line oven (8.9 MMBtu/hr), identified as C-4, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(c) One (1) rollcoater and direct fired natural gas line oven (8.9 MMBtu/hr), identified as C-5, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(d) One (1) rollcoater and direct fired natural gas line oven (8.9 MMBtu/hr) identified as C-6, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(a) Six (6) direct fired ovens rated at 9.5 MMBtu/hr each.

(b) Four (4) direct fired ovens rated at 8.9 MMBtu/hr each.

(c) Twenty-one (21) space heaters rated at 0.3 MMBtu/hr each.

(d) Six (6) space heaters rated at 0.55 MMBtu/hr each.

(e) Two (2) air make-up units rated at 7.0 MMBtu/hr each.

(f) Two (2) air make-up units rated at 7.15 MMBtu/hr each.

(g) Two (2) air make-up units rated at 3.0 MMBtu/hr each.

(2) Degreasing activities that do not exceed 145 gallons per 12 months per unit, except if subject to 326 IAC 20-6.

(3) Paved and unpaved roads and parking lots with public access.

(4) Asbestos abatement projects regulated by 326 IAC 14-10.

(5) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process.

(6) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22); and

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision;

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Not withstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-3 (Emission Offset), and OP 3420-0012-0263, issued on October 31, 1990, the total source emissions of volatile organic compounds shall be limited to 475 tons per 12 consecutive month period.

The source shall show compliance with this limit by use of the following equation:

VOC Emissions =( Input VOC from P001) + (Input VOC x (1-Control Efficiency) from P002)

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

**Testing Requirements [326 IAC 2-7-6(1)]**

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM,, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due.

If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Stratospheric Ozone Protection**

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

(1) Emission unit P001 consists of the following:

(a) One (1) rollcoater, one (1) lithography press and a direct fired natural gas line oven, identified as PC-1, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-1 and S-2.

(b) One (1) rollcoater, three (3) lithography presses and a direct fired natural gas line oven, identified as PC-2, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr , respectively, and exhausting to stacks S-3 and S-4.

(c) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-7, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-6 and S-7.

(d) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-8, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-8 and S-9.

(e) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-9, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-10 and S-11.

(f) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-10, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-12 and S-13.

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-3]

Pursuant to 326 IAC 8-2-3(b), no owner or operator of a facility engaged in the surface coating of can may cause allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following delivered to the coating applicator:

| Coating | 326 IAC 8-2-3 Limit (lb VOC/gal), less water |
|---|---|
| Exterior Base Coat | 2.8 |
| Over Varnish | 2.8 |

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Volatile Organic Compounds (VOC)

(a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and C.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and C.1 shall be based on total actual emissions, from all coating lines, utilizing daily units of production (number of sheets coated), application rates (gallons per number of sheets coated), solvent and solid contents of each coating and emission control efficiency incinerator systems.

D.1.5 VOC Emissions

Compliance with Condition C.1 and D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.1.6 Monitoring

Pursuant to OP 3420-0012-0263, issued October 31, 1990, the use of the after-burners on the line ovens may be discontinued during the months of November through March, provided that no odor problem is created.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.7 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and C.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and C.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day;

(4) The cleanup solvent usage and ink usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition C.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(2) Emission unit P002 consists of the following:

(a) One (1) rollcoater, identified as C-3, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(b) One (1) rollcoater, identified as C-4, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(c) One (1) rollcoater, identified as C-5, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(d) One (1) rollcoater, identified as C-6, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-3]

(a) Pursuant to 326 IAC 8-2-3(b), no owner or operator of a facility engaged in the surface coating of can may cause allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following delivered to the coating applicator:

| Coating | 326 IAC 8-2-3 Limit (lb VOC/gal), less water |
|---|---|
| Exterior Base Coat | 2.8 |
| Over Varnish | 2.8 |

(b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-3(b), 2.8 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 45.2 pounds per gallon of coating solids delivered to the applicator.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

**Compliance Determination Requirements**

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 24 and 30 months after issuance of this permit, the Permittee shall perform, as required by the Title V permit, the initial inlet and outlet VOC testing of the thermal oxidizer according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified in the rule or as approved by the commissioner. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.2.4 Volatile Organic Compounds (VOC)

(a) The thermal oxidizer and the fans moving the exhaust fumes from the can coating operation to the thermal oxidizer shall be in operation at all times that one or more of the can coating lines from Emission Unit P002 is operated.

(b) When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,400°F or a temperature determined in the compliance tests to maintain no less than the equivalent overall efficiency. This equivalent overall efficiency shall be determined by the following equations:

(a) Equivalency shall be determined by:

$$E = \frac{L}{1 - L/D}$$

where: L = Applicable emission limit in pounds of VOC per gallon of coating.

D = Density of VOC in coating in pounds per gallon of VOC.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

(b) Equivalent overall efficiency of the thermal oxidizer shall be calculated by the following equation:

$$O = \frac{V - E \times 100}{V}$$

Where: V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the can coating lines in pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

(c) Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and C.1 shall be based on total actual emissions, from all coating lines, utilizing daily units of production (number of sheets coated), application rates (gallons per number of sheets coated), solvent and solid contents of each coating and emission control efficiency incinerator systems.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.2.5 VOC Emissions

Compliance with Condition C.1 and D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.2.6 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and C.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and C.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.4, the Permittee shall maintain a log of daily thermal oxidizer temperatures, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 and C.1shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Insignificant Activity - Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9$^{O}$C) (one hundred twenty degrees Fahrenheit (120$^{O}$F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR MANAGEMENT
# COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT CERTIFICATION

Source Name: United States Can Company
Source Address: U.S. Routes 12 & 49, Chesterton, IN 46304
Mailing Address: U.S. Routes 12 & 49, Chesterton, IN 46304
Part 70 Permit No.: T127-7553-00012

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

□ Annual Compliance Certification Letter

□ Test Result (specify) _____

□ Report (specify) _____

□ Notification (specify) _____

□ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR MANAGEMENT

**COMPLIANCE DATA SECTION**
**P.O. Box 6015**
**100 North Senate Avenue**
**Indianapolis, Indiana 46206-6015**
**Phone: 317-233-5674**
**Fax: 317-233-5967**

## PART 70 OPERATING PERMIT
## EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: United States Can Company
Source Address: U.S. Routes 12 & 49, Chesterton, IN 46304
Mailing Address: U.S. Routes 12 & 49, Chesterton, IN 46304
Part 70 Permit No.: T127-7553-00012

**This form consists of 2 pages** **Page 1 of 2**

| Check either No. 1 or No.2 |
|---|
| ☐ 1. This is an emergency as defined in 326 IAC 2-7-1(12)<br>• The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and<br>• The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| ☐ 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)<br>• The Permittee must submit notice in writing within ten (**10**) calendar days |

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency/Deviation: |
| Describe the cause of the Emergency/Deviation: |

If any of the following are not applicable, mark N/A **Page 2 of 2**

| |
|---|
| Date/Time Emergency/Deviation started: |
| Date/Time Emergency/Deviation was corrected: |
| Was the facility being properly operated at the time of the emergency/deviation? Y N<br>Describe: |
| Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency/deviation: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR MANAGEMENT
# COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: United States Can Company
Source Address: U.S. Routes 12 & 49, Chesterton, IN 46304
Mailing Address: U.S. Routes 12 & 49, Chesterton, IN 46304
Part 70 Permit No.: T000-0000-00000
Facility: Source
Parameter: VOC
Limit: 475 tons/yr, monthly rolling average

YEAR: _____

| MONTH | P001 | | P002 | | | | TOTAL |
|---|---|---|---|---|---|---|---|
| | Column 1 | Column 2 | Column 3 | Column 4 | Column 5 | Column 6 | |
| | VOC emissions (coatings, solvents and inks) tons VOC Input = VOC output | VOC emissions prior 11 months, tons | VOC input, tons | VOC emissions (Column 3 x (1-C.E.) tons | VOC emissions (solvents and inks) tons | VOC emissions prior 11 months | Col. 1 + Col. 2 + Col. 4 + Col. 5 + Col. 6 |
| Month 1 | | | | | | | |
| Month 2 | | | | | | | |
| Month 3 | | | | | | | |

□ No deviation occurred in this quarter.

□ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR MANAGEMENT
# COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT
## QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: United States Can Company
Source Address: U.S. Routes 12 & 49, Chesterton, IN 46304
Mailing Address: U.S. Routes 12 & 49, Chesterton, IN 46304
Part 70 Permit No.: T127-7553-00012

**Months:** _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

| **Compliance Monitoring Requirement** (e.g. Permit Condition D.1.3) | **Number of Deviations** | **Date of each Deviation** |
|---|---|---|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management
# Office of Air Management

## Technical Support Document (TSD) for a Part 70 Operating Permit

**Source Background and Description**

| | |
|---|---|
| **Source Name:** | **United States Can Company** |
| **Source Location:** | **U.S. Routes 12 & 49, Chesterton, IN 46304** |
| **County:** | **Porter** |
| **SIC Code:** | **3411** |
| **Operation Permit No.:** | **T127-7553-00012** |
| **Permit Reviewer:** | J. Patterson |

The Office of Air Management (OAM) has reviewed a Part 70 permit application from United States Can Company relating to the metal can surface coating operation.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

(1) Emission unit P001 consists of the following:

(a) One (1) rollcoater, one (1) lithography press and a direct fired natural gas line oven, identified as PC-1, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-1 and S-2.

(b) One (1) rollcoater, three (3) lithography presses and a direct fired natural gas line oven, identified as PC-2, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr , respectively, and exhausting to stacks S-3 and S-4.

(c) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-7, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-6 and S-7.

(d) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-8, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-8 and S-9.

(e) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-9, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-10 and S-11.

(f) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-10, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and 9.5 MMBtu/hr, respectively, and exhausting to stacks S-12 and S-13.

(2) Emission unit P002 consists of the following:

(a) One (1) rollcoater and direct fired natural gas line oven (8.9 MMBtu/hr), identified as C-3, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(b) One (1) rollcoater and direct fired natural gas line oven (8.9 MMBtu/hr), identified as C-4, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(c) One (1) rollcoater and direct fired natural gas line oven (8.9 MMBtu/hr), identified as C-5, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(d) One (1) rollcoater and direct fired natural gas line oven (8.9 MMBtu/hr) identified as C-6, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

**Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR**

There are no unpermitted facilities operating at this source during this review process.

**New Emission Units and Pollution Control Equipment Requiring ENSR**

There are no new facilities to be reviewed under the ENSR process.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(a) Six (6) direct fired ovens rated at 9.5 MMBtu/hr each.

(b) Four (4) direct fired ovens rated at 8.9 MMBtu/hr each.

(c) Twenty-one (21) space heaters rated at 0.3 MMBtu/hr each.

(d) Six (6) space heaters rated at 0.55 MMBtu/hr each.

(e) Two (2) air make-up units rated at 7.0 MMBtu/hr each.

(f) Two (2) air make-up units rated at 7.15 MMBtu/hr each.

(g) Two (2) air make-up units rated at 3.0 MMBtu/hr each.

(2) Degreasing activities that do not exceed 145 gallons per 12 months per unit, except if subject to 326 IAC 20-6.

(3) Paved and unpaved roads and parking lots with public access.

(4) Asbestos abatement projects regulated by 326 IAC 14-10.

(5) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process.

(6) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

**Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

(1) OP 3420-0012-0263, issued on October 31, 1990;

(2) R127-3566-00012, issued on April 11, 1994; and

(3) R127-3565-00012, issued on May 4, 1994.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(1) OP 3420-0012-0263, issued on October 31, 1990

Condition 7: That emission credits (119 tons VOC per year from Continental Can Company's #17 Portage Plant) shall be allowable as an offset, not to exceed 950 pounds of VOC per 24 hour period.

Reason not incorporated: The #17 Portage plant was closed in July, 1983 and this condition originally appeared on OP 64-10-88-0178, issued February 5, 1985 and was subsequently included on OP 3420-0012-0263, issued on October 31, 1990. The emission credit was meant to be used by United Can Company for any new construction or modifications at their plant for which this Title V permit is applicable. It is also meant to be used within a five year period and since it has been approximately 13 years since this condition was written, it is no longer valid. Therefore, the emission credit of 119 tons VOC per year is no longer available.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996.

A notice of completeness letter was mailed to the source on January 8, 1997.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations, page 1 of 1.

**Potential Emissions**

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

| Pollutant | Potential Emissions (tons/year) |
|---|---|
| PM | less than 100 |
| PM-10 | less than 100 |
| $SO_2$ | less than 100 |
| VOC | greater than 100 |
| CO | less than 100 |
| $NO_x$ | less than 100 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's | Potential Emissions (tons/year) |
|---|---|
| methyl isobutyl ketone | greater than 10 |
| formaldehyde | less than 10 |
| xylene | less than 10 |
| ethylbenzene | less than 10 |
| toluene | less than 10 |
| naphthalene | less than 10 |
| glycol ethers | greater than 10 |
| methanol | less than 10 |
| hexane | less than 10 |
| methyl ethyl ketone | less than 10 |
| isophorene | less than 10 |
| phenol | less than 10 |
| TOTAL | greater than 25 |

(a) The potential emissions (as defined in 326 IAC 1-2-55) of volatile organic compounds are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

| Pollutant | Actual Emissions (tons/year) |
|---|---|
| PM | 0 |
| PM-10 | 0 |
| $SO_2$ | 0.008 |
| VOC | 190.92 |
| CO | 0.28 |
| $NO_x$ | 1.4 |
| *HAP methyl isobutyl ketone | 19.89 |
| formaldehyde | 0.23 |
| xylene | 7.48 |

| | |
|---|---|
| ethylbenzene | 0.81 |
| toluene | 3.44 |
| naphthalene | 1.12 |
| glycol ethers | 50.7 |
| methanol | 0.37 |
| hexane | 0.37 |
| methyl ethyl ketone | 5.69 |
| isophorone | 0.91 |
| phenol | 0.31 |

*HAPs data is from the Title V application submitted by the source

**Limited Potential to Emit**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

| | Limited Potential to Emit (tons/year) | | | | | | |
|---|---|---|---|---|---|---|---|
| Process/facility | PM | PM-10 | $SO_2$ | VOC | CO | $NO_X$ | HAPs |
| Source | | | | 475 | | | |
| Total Emissions | | | | 475 | | | |

**County Attainment Status**

The source is located in Porter County.

| Pollutant | Status |
|---|---|
| TSP | attainment |
| PM-10 | unclassifiable |
| $SO_2$ | attainment |
| $NO_2$ | unclassifiable/attainment |
| Ozone | severe nonattainment |
| CO | unclassifiable/attainment |
| Lead | not designated |

(a) Volatile organic compounds (VOC) and oxides of nitrogen (Nox) are precursors for the formation of ozone. Therefore, VOC and $NO_X$ emissions are considered when evaluating the rule applicability relating to the ozone standards. Porter County has been designated as nonattainment for ozone.

**Federal Rule Applicability**

(a) United States Can Company is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.490, Subpart WW), because they do not perform beverage can surface coating operations.

(b) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.43, Subpart QQ), Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing, because the printing presses are offset lithography and not publication rotogravure.

(c) United States Can Company is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.460 Subpart T because they do not use in the degreaser any solvent containing the following as a cleaning or drying agent:

(1) perchloroethylene
(2) trichloroethylene
(3) 1,1,1-trichloroethane
(4) carbon tetrachloride
(5) chloroform

(d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart KK, National Emission Standards for the Printing and Publishing Industry, because the printing presses are offset lithography and not publication rotogravure, product and packaging rotogravure or wide-web flexographic.

**State Rule Applicability - Entire Source**

326 IAC 2-3 Emission Offset

Pursuant to 326 IAC 2-3 (Emission Offset), this source is a major source because the source emits or has the potential to emit VOCs that exceed 25 tons/yr and is located in Porter County. Pursuant to OP 3420-0012-0263, issued on October 31, 1990, the source's VOC emissions are limited to 475 tons/yr.

326 IAC 2-2 Prevention of Significant Deterioration

Since this source is a major stationary source because emissions of volatile organic compounds, in a county designated as severe nonattainment for ozone, are greater than 25 tons per year, all criteria attainment pollutants must be reviewed pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compounds and is located in Porter County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

326 IAC 8-1-6 (BACT)

All the lithographic presses were constructed prior to January 1, 1980. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-2-3 (Can Coating Operations)

Can coating emission limitations as specified by 326 IAC 8-2-3 are applicable to facilities in Porter County which existed as of January 1, 1980 and have potential emissions of 100 tons per year or greater. Pursuant to 326 IAC 8-2-3(b), the emissions from the can coating operations, shall not discharge volatile organic compounds in excess of the following:

| Coating | 326 IAC 8-2-3 Limit (lb VOC/gal), less water |
|---|---|
| Exterior Base Coat | 2.8 |
| Over Varnish | 2.8 |

(1) The pounds of VOC per gallon of coating, less water, delivered to the applicator for each coating used by Emission Unit P001 are less than the 326 IAC 8-2-3 limit, therefore, each coating complies with this rule.

(2) For Emission Unit P002, the source has chosen to comply with 326 IAC 8-2-3 by the use of a thermal oxidizer with a minimum overall control efficiency which shall be no less than the equivalent overall efficiency. This equivalent overall efficiency shall be determined by the following equations:

(a) Equivalency shall be determined by:

$$E = \frac{L}{1 - L/D}$$

where: L = Applicable emission limit in pounds of VOC per gallon of coating.

D = Density of VOC in coating in pounds per gallon of VOC.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Therefore: $E = \frac{2.8}{1 - (2.8/7.36)} = 4.52$

(b) Equivalent overall efficiency of the thermal oxidizer shall be calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where: V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the can coating lines in pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

Therefore: $O = \frac{(23.46^* - 4.52)}{23.46} \times 100 = 80.7\%$

*Represents highest VOC content in lbs VOC/gal solids as presented in the Title V application.

326 IAC 8-5-5 (Graphic Arts Operations)

The offset lithography presses, Emission Unit P001, are not subject to 326 IAC 8-5-5 because these presses are not packaging rotogravure, publication rotogravure or flexographic.

326 IAC 8-6 ( Organic Solvent Emission Limitations )

This source is not subject to 326 IAC 8-6 because it commenced operations prior to October 7, 1974 and it is not located in Lake or Marion counties.

326 IAC 8-7 (Specific VOC reduction requirements for Lake, Porter, Clark and Floyd Counties)

Pursuant to 326 IAC 8-7-2(a)(3)(G), offset lithography is exempt. Therefore, 326 IAC 8-7 does not apply.

326 IAC 8-3-5 (Cold cleaner degreaser operation and control)

(a) Pursuant to 326 IAC 8-3-5, the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can easily be operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals ( fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch ) measured at thirty-eight degrees Celsius (38°C) ( one hundred degrees Fahrenheit (100°F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals ( thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) ( one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals ( thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) ( one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) The owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The emission unit P001 has applicable compliance monitoring conditions as specified below:

(a) Record keeping of information sufficient to show that VOC emissions are not discharged in excess of 2.8 lb/gal of coating, excluding water.

These monitoring conditions are necessary to show compliance with 326 IAC 8-2-3.

2. The emission unit P002 has applicable compliance monitoring conditions as specified below:

(a) Record keeping of information sufficient to show that VOC emissions are not discharged in excess of 2.8 lb/gal of coating, excluding water. This will be achieved through the use of a thermal oxidizer and equivalent emissions calculations.

These monitoring conditions are necessary to show compliance with 326 IAC 8-2-3.

3. The thermal oxidizer, TO-1, has applicable monitoring requirements as specified below:

(a) The minimum thermal oxidizer overall control efficiency, in order for emission unit P002 to comply with 326 IAC 8-2-3, shall be determined by the equivalent emissions as documented by 2(a) above. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,400°F or a temperature determined in the compliance tests to maintain an overall control efficiency necessary for emission unit P002 to comply with 326 IAC 8-2-3.

4. The source has applicable monitoring conditions as specified below:

(a) Record keeping of information sufficient to show that the source VOC emissions do not exceed 475 tons per year, based on a monthly rolling average.

These monitoring conditions are necessary to show compliance pursuant to OP 3420-0012-0263, issued on October 31, 1990.

**Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) Since this source has no new construction or reconstruction, 326 IAC 2-1-3.4 New Source Toxics Control, does not apply.

**Conclusion**

The operation of this metal can surface coating operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T127-7553-00012.**

# Indiana Department of Environmental Management
# Office of Air Management

Addendum to the
Technical Support Document for Part 70 Operating Permit

| | |
|---|---|
| **Source Name:** | United States Can Company |
| **Source Location:** | U.S. Routes 12 and 49, Chesterton, Indiana 46304 |
| **County:** | Porter |
| **SIC Code:** | 3411 |
| **Operation Permit No.:** | T127-7553-00012 |
| **Permit Reviewer:** | J. Patterson / Catherine Moore |

On October 22, 1998, the Office of Air Management (OAM) had a notice published in the Vidette Messenger, Valparaiso, Indiana, stating that United States Can Company had applied for a Part 70 Operating Permit to operate a metal can surface coating operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 20, 1998, David Jordan of ERM, consultant for United States Can Company submitted comments on the proposed Part 70 Operating Permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

**Comment 1:**

Condition A.2 - This condition lists and describes equipment associated with Emission Unit P001 and P002. The input Btu capacity for all ovens associated with P001 should be 8.9 mmBtu/hr/unit (rather than 9.5), while the input Btu capacity for all ovens associated with P002 should be 9.5 mmBtu/hr/unit (rather than 8.9).

**Response to Comment 1:**

Condition A.2 "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) Emission unit P001 consists of the following:

(a) One (1) rollcoater, one (1) lithography press and a direct fired natural gas line oven, identified as PC-1, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr, respectively, and exhausting to stacks S-1 and S-2.

(b) One (1) rollcoater, three (3) lithography presses and a direct fired natural gas line oven, identified as PC-2, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr , respectively, and exhausting to stacks S-3 and S-4.

(c) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-7, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr, respectively, and exhausting to stacks S-6 and S-7.

(d) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-8, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr, respectively, and exhausting to stacks S-8 and S-9.

(e) One (1) rollcoater, two (2) lithography presses and a direct fired natural gas line oven, identified as PC-9, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr, respectively, and exhausting to stacks S-10 and S-11.

(f) One (1) rollcoater, four (4) lithography presses and a direct fired natural gas line oven, identified as PC-10, with maximum capacities of 6,000 pieces of sheet metal per hour, 244 feet per minute and ~~9.5~~ **8.9** MMBtu/hr, respectively, and exhausting to stacks S-12 and S-13.

(2) Emission unit P002 consists of the following:

(a) One (1) rollcoater and direct fired natural gas line oven (~~8.9~~ **9.5** MMBtu/hr), identified as C-3, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(b) One (1) rollcoater and direct fired natural gas line oven (~~8.9~~ **9.5** MMBtu/hr), identified as C-4, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(c) One (1) rollcoater and direct fired natural gas line oven (~~8.9~~ **9.5** MMBtu/hr), identified as C-5, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

(d) One (1) rollcoater and direct fired natural gas line oven (~~8.9~~ **9.5** MMBtu/hr) identified as C-6, with a maximum capacity of 6,000 pieces of sheet metal per hour, vented to a thermal oxidizer (TO-1), and exhausted to stack S-5.

**Comment 2:**

Condition A.3 - This condition lists insignificant activities that are specifically regulated under Indiana Rules. The ovens listed under (1)(a) and (b) of this condition are included under the description of Emission Units P001 and P002. US Can suggests that the reference to these ovens under Condition A.3 be deleted. If the equipment description is retained, the Btu capacities of the ovens should be switched as described in Comment 1.

**Response to Comment 2:**

Condition A.3(1) “Specifically Regulated Insignificant Activities” has been changed to be as follows:

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

~~(a) Six (6) direct fired ovens rated at 9.5 MMBtu/hr each.~~

~~(b) Four (4) direct fired ovens rated at 8.9 MMBtu/hr each.~~

~~(c)~~**(a)** Twenty-one (21) space heaters rated at 0.3 MMBtu/hr each.

~~(d)~~**(b)** Six (6) space heaters rated at 0.55 MMBtu/hr each.

~~(e)~~**(c)** Two (2) air make-up units rated at 7.0 MMBtu/hr each.

~~(f)~~**(d)** Two (2) air make-up units rated at 7.15 MMBtu/hr each.

~~(g)~~**(e)** Two (2) air make-up units rated at 3.0 MMBtu/hr each.

**Comment 3:**

Condition A.3 - The intent of this condition appears to list only those insignificant activities for which applicable requirements apply. US Can knows of no specific applicable requirements for items (5) and (6) under this condition, and requests that these references be deleted.

**Response to Comment 3:**

Condition A.3(5) and (6) "Specifically Regulated Insignificant Activities" have been deleted from the final permit as follows:

~~(5) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process.~~

~~(6) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.~~

**Comment 4:**

Condition B.27 - This condition states that OAM may use "other credible evidence" in determining the compliance status of this plant. US Can understands that this language is intended to parallel EPA rulemaking in its Any Credible Evidence (ACE) statute. US Can believes that the Title V permit program is intended to create a roadmap for sources to evaluate whether or not they are in compliance with all applicable requirements related to their operations. The presence of this clause leads to uncertainty over the manner in which certain "other evidence" would be used for the purpose of determining compliance. In addition, US Can does not believe that Indiana has a statute comparable to the Federal ACE regulation. US Can requests that this condition be deleted entirely, or at least removed until such time as Indiana Pollution Control Rules are amended to contain a requirement comparable to the Federal statute.

**Response to Comment 4:**

IDEM, OAM now believes that this condition is not necessary and has removed it from the final permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit. Condition B.27 "Credible Evidence" has been deleted from the final permit as follows:

~~B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or noncompliance.~~

**Comment 5:**

Condition D.1.1 - This condition established limitations for exterior base coat and over varnish coatings. US Can requests that the wording of this table be modified to read "sheet base coat (exterior and interior) and overvarnish" to be consistent with Rule 8-2-3.

**Response to Comment 5:**

Condition D.1.1 "Volatile Organic Compounds" has been changed to be as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-3]

Pursuant to 326 IAC 8-2-3(b), no owner or operator of a facility engaged in the surface coating of can may cause allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following delivered to the coating applicator:

| Coating | 326 IAC 8-2-3 Limit (lb VOC/gal), less water |
|---|---|
| ~~Exterior~~ **Sheet** Base Coat **(Exterior and Interior)** | 2.8 |
| Over Varnish | 2.8 |

**Comment 6:**

Condition D.1.2 - This condition requires that a preventive maintenance plan be developed for Emission Unit P001. US Can believes that Indiana Rule 326 IAC 1-6, which contains the preventive maintenance plan requirements, is directed at PM for pieces of air pollution control equipment. Emission Unit P001 contains printing and coating lines that do not utilize pieces of air pollution control equipment. For this reason, US Can asks that this condition be deleted.

**Response to Comment 6:**

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

1) Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7-4(c)(9);
2) Implement the preventive maintenance plan; and,
3) Forward to the department upon request the preventive maintenance plan.

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only for:

(a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
(b) the unit has existing applicable requirements; and
(c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
(d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
(e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that if a facility does not meet the above requirements, compliance monitoring will never be necessary, it does state that a compliance monitoring plan is not required to be submitted with the application. In most cases, the requirement to maintain a preventive maintenance plan and perform compliance monitoring has followed the same guidelines as specified above.

However, there are some types of operations (i.e. woodworking) that the OAM has determined that compliance monitoring and preventive maintenance plans are necessary to ensure continuous compliance.

Since Emission Units P001 and P002 have a limit on their potential to emit Volatile Organic Compound (VOC) so that the requirements of 326 IAC 2-3 (Emission Offset) is not applicable, a Preventive Maintenance Plan is required for these emission units. There will be no changes to this condition in the final permit due to this comment.

**Comment 7:**

Condition D.1.4 - This condition provides procedures for determining compliance with VOC emission limitations contained in the permit for Emission Unit P001. Historically, US Can has averaged emissions across all coating and press lines to determine compliance on a daily weighted average with applicable pound per gallon limits. In discussions with IDEM staff earlier this year, it was agreed that the Title V permit for US Can should continue to allow cross-line averaging, and the wording of Condition D.1.4 was modified to include subsection (b) intended to permit such averaging. US Can requests that the wording of (b) be further modified as outlined below with regard to such averaging:

"Compliance with the VOC content ~~and usage~~ limitations contained in Conditions D.1.1 ~~and C.1~~ shall be based on total actual emissions ~~from~~ **averaged across** all coating **applicators from sheet basecoat (exterior and interior) and over varnish** lines **included in Emission Unit P001 and Emission Unit P002**, utilizing daily units of production (number of sheets coated), application rates (gallons per number of sheets coated), solvent and solid contents of each coating and emission control efficiency incinerator systems."

US Can suggests the creation of a new subsection (c) to address compliance with Condition C.1.

**Response to Comment 7:**

Condition D.1.4 "Volatile Organic Compounds" has been changed to be as follows:

D.1.4 Volatile Organic Compounds (VOC)

(a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and C.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the VOC content ~~and usage~~ limitations contained in Condition~~s~~ D.1.1 ~~and C.1~~ shall be based on total actual emissions, ~~from~~ **averaged across** all coating ~~lines~~ **applicators from sheet base coat (exterior and interior) and overvarnish lines**, utilizing daily units of production (number of sheets coated), application rates (gallons per number of sheets coated), solvent and solid contents of each coating and emission control efficiency incinerator systems.

**(c) Compliance with the VOC content and usage limitations contained in Condition C.1 shall be based on total actual emissions, averaged across all coating applicators from sheet base coat (exterior and interior) and overvarnish lines, utilizing daily units of production (number of sheets coated), application rates (gallons per number of sheets coated), solvent and solid contents of each coating and emission control efficiency incinerator systems.**

**Comment 8:**

Condition D.1.6 - This condition indicates that the use of afterburners is not required in certain months of the year. Since Emission Unit P001 does not involve the use of any afterburners, US Can assumes that this condition should be listed in Section D.2 rather than D.1.

**Response to Comment 8:**

Condition D.1.6 "Monitoring" has been deleted from Section D.1 and moved to Section D.2. This condition has been renumbered Condition D.2.6. The remaining conditions of these sections have been renumbered:

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.~~1~~**2**.6 Monitoring

Pursuant to OP 3420-0012-0263, issued October 31, 1990, the use of the after-burners on the line ovens may be discontinued during the months of November through March, provided that no odor problem is created.

**Comment 9:**

Condition D.1.7(a) - This condition outlines record keeping requirements for Emission Unit P001. The second sentence states that records for listed items "...shall be taken daily..." The items included in this list under (4), (5), and (6) are items that need only be recorded monthly. US Can asks that paragraph (a) be clarified to indicate that these records are not required daily.

**Response to Comment 9:**

Condition D.1.7(a) (now renumbered Condition D.1.6(a)) "Record Keeping Requirements" has been changed to be as follows:

(a) To document compliance with Conditions D.1.1 and C.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1)**, (2) and (3)** ~~through (6)~~ shall be taken daily **while records maintained for (4), (5) and (6) shall be taken monthly** and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and C.1.

**Comment 10:**

Condition D.2.1(a) - This condition establishes limitations for exterior base coat and over varnish coatings. US Can requests that the wording of this table be modified to read "sheet base coat (exterior and interior) and overvarnish" to be consistent with Rule 8-2-3.

**Response to Comment 10:**

Condition D.2.1(a) "Volatile Organic Compounds" has been changed to be as follows:

(a) Pursuant to 326 IAC 8-2-3(b), no owner or operator of a facility engaged in the surface coating of can may cause allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following delivered to the coating applicator:

| Coating | 326 IAC 8-2-3 Limit (lb VOC/gal), less water |
|---|---|
| ~~Exterior~~ **Sheet** Base Coat **(Exterior and Interior)** | 2.8 |
| Over Varnish | 2.8 |

**Comment 11:**

Condition D.2.1(b) - This condition specifies that the capture system for the P002 coating lines achieve a 95% capture efficiency and that the thermal oxidizer achieve a 95% destruction efficiency. US Can does not believe that it is appropriate to specify a capture and destruction efficiency as a part of this permit. At most, the permits should merely state that the capture and control system shall be such that the VOC content limitation established in D.2.1(a) is met. If IDEM believes that an efficiency must be included in the permit, US Can requests that the efficiency be specified as an overall value rather than a specific number for capture and destruction. US Can believes that this overall efficiency should be a minimum of 85% for its Burns Harbor operations.

**Response to Comment 11:**

Condition D.2.1(b) "Volatile Organic Compounds" has been changed to be as follows:

(b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-3(b), 3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum ~~95% capture efficiency and 95% destruction~~ **85% overall control** efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of ~~90%~~ **85%**, the VOC content of the coating shall not exceed ~~45.2~~ **30.13** pounds per gallon of coating solids delivered to the applicator.

**Comment 12:**

Condition D.2.4(a) - This condition requires US Can to operate their thermal oxidizer at all times in which one or more of the can coating lines from Emission Unit P002 are operating. While US Can utilizes the thermal oxidizer in many instances to comply with applicable VOC content requirements, US Can utilizes some coatings that comply with the applicable VOC content requirement as applied. US Can suggests that this condition be reworded as follows: "...shall be in operation at all times that one or more of the coating lines from Emission Unit P002 is operated **using coatings with a VOC content above permissible levels.**"

**Response to Comment 12:**

IDEM, OAM agrees that this condition can be changed. However, the Permittee should be aware that the thermal oxidizer is also needed to comply with the 475 tons VOC per year limit specified in Condition C.1 "Major Source". Therefore, the Permittee may need to run the thermal oxidizer even when this emission unit is using compliant coatings. Therefore, Condition D.2.4(a) "Volatile Organic Compounds" has been changed to be as follows:

(a) The thermal oxidizer and the fans moving the exhaust fumes from the can coating operation to the thermal oxidizer shall be in operation at all times that one or more of the can coating lines from Emission Unit P002 is operated **when necessary to ensure compliance with Condition C.1 or Condition D.2.1**.

**Comment 13:**

Condition D.2.4(c) - The wording for this condition should be modified as discussed above in Comment #6 for Condition D.1.4.

**Response to Comment 13:**

Condition D.2.4(c) "Volatile Organic Compounds" has been changed to be as follows:

(c) Compliance with the VOC content ~~and usage~~ limitations contained in Condition~~s~~ D.2.1 ~~and C.1~~ shall be based on total actual emissions, ~~from~~ **averaged across** all coating ~~lines~~ **applicators from sheet base coat (exterior and interior) and overvarnish lines**, utilizing daily units of production (number of sheets coated), application rates (gallons per number of sheets coated), solvent and solid contents of each coating and emission control efficiency incinerator systems.

Condition D.2.4(d) "Volatile Organic Compounds" has been added to the final permit as follows. The remaining subsections of this condition have been renumbered:

**(d) Compliance with the VOC content and usage limitations contained in Condition C.1 shall be based on total actual emissions, averaged across all coating applicators from sheet base coat (exterior and interior) and overvarnish lines, utilizing daily units of production (number of sheets coated), application rates (gallons per number of sheets coated), solvent and solid contents of each coating and emission control efficiency incinerator systems.**

**Comment 14:**

Technical Support Document - The Technical Support Document contains a listing of items noted as insignificant in the Title V application. In addition to those items listed, US Can wishes to note that it has recently installed a solvent filter system (a Membrex Filtration Unit) with emissions below de minimis levels.

**Response to Comment 14:**

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

**Comment 15:**

Technical Support Document - The Technical Support Document contains a table (on page 4 of 11) that indicates whether certain HAPs are above or below 10 tons per year. US Can wishes to note that this listing is based upon materials in use at the time the Title V application was filed, and that the equipment at the plant is physically capable of utilizing raw materials that may contain different percentages of HAPs (or even HAPs not included in this listing). Thus, a material listed as below the HAP major source threshold of 10 tons per year could, at a future date, become major depending upon changes to raw materials in the future.

**Response to Comment 15:**

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Upon further review, OAM has made the following changes to the final Part 70 permit:

1. Condition C.3 “Opacity” has been changed to be as follows:

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ **opacity** shall meet the following, unless otherwise stated in this permit:

(a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~ **any one (1) six minute averaging period**, as determined in 326 IAC 5-1-4.

(b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From Surface Coating Operations**

**Company Name:** United States Can Company
**Address City IN Zip:** U. S. Route 12 & 49, Chesterton, IN 46304
**Part 70 No.:** T127-7553-00012
**County:** Porter
**Reviewer:** J. Patterson
**Date:** 1/21/98

| Material | Density (Lb/Gal) | Weight % Volatile (H20& Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Vol (solids) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential ton/yr | lb VOC /gal solids | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 53-V-177 | 8.5 | 32.47% | 0.0% | 32.47% | 0.0% | 67.50% | varies | 6000.000 | 2.76 | 2.76 | 0.00 | 0.00 | 0.00 | 0.00 | 4.09 | 100% |
| 33H7 | 8.8 | 30.00% | 0.0% | 30.00% | 0.0% | 63.98% | varies | 6000.000 | 2.64 | 2.64 | 0.00 | 0.00 | 0.00 | 0.00 | 4.13 | 100% |
| 220-C27-1054 | 8.5 | 32.35% | 0.0% | 32.35% | 0.0% | 61.00% | varies | 6000.000 | 2.75 | 2.75 | 0.00 | 0.00 | 0.00 | 0.00 | 4.51 | 100% |

**State Potential Emissions** **Add worst case coating to all solvents**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used